

ATTACHMENT B

Namadgi National Park Revised Draft Plan of Management

Report on Submissions

June 2007

Namadgi National Park Draft Plan of Management

Report on Submissions

Being a report on:

- (a) the Conservator's consultation with the public and any other person or authority about the draft plan¹;
- (b) issues raised in written comments on the draft plan¹;
- (c) the response in the revised draft plan to the written comments.

(1 As required by the Land (Planning and Environment) Act s. 202)

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1. Introduction

The *Namadgi National Park Draft Plan of Management* drew 175 submissions from organisations and individuals (listed under heading 3 below). Forty-nine submissions were received from organisations including government agencies and committees, corporations, rural landholders, and community organisations with an interest in nature conservation, outdoor recreation and cultural heritage. Some of these submissions were wide ranging, others focused mainly on the interests and activities of the group. There were 126 submissions from individuals. While some were short, dealing with a few issues only, it is notable that many provided a detailed assessment of the whole plan or discussed a particular issue at some length. A sizable number of the individual submissions were from members of organisations, and their submissions often restated material contained in the organisational submissions (especially for Chapter 8: Recreation). The effect of this is that a large number of (sometimes lengthy) individual submissions do not necessarily expand the number of core issues to be considered in relation to a particular theme.

Management planning for reserve areas such as a national park is not just about balancing competing views, as may be presented through public consultation. These views must always be set in the context of national park philosophy and the special values of the reserved area. The Namadgi Plan commences with a statement of significance that sets out the values of the park. The management plan retains policies to protect those values (e.g. wilderness, water supply), even though, in particular instances, some or many respondents may oppose those policies.

A good knowledge of the park and understanding of management issues is evident in many of the submissions, reflecting the fact that those organisations and individuals have had a long involvement with the area. This may have been in activities such as managing the water supply catchment, planning for and fighting bushfires, campaigning for the declaration of the park, undertaking bushwalking or other outdoor recreation, maintaining cultural heritage places, conducting ecological surveys or scientific research. It should be noted also that some submissions contain views and issues that cannot be included in or resolved by the plan. These include opposition to national parks in general and Namadgi in particular, and assurances in the plan of government funding for all the policies, actions and management functions contained in the plan.

Key issues raised in submissions are listed below. Responses to these issues are detailed under heading 2.

- **Zoning (Chapter 3):** especially with regard to Zone 2 (Semi-Remote Area). Key issues were the suggestion that the wilderness zone should be extended into Zone 2 and concerns about the types of recreation activities permitted. There was also concern about fire trail proposals.
- **Catchment protection (Chapter 4):** Concerns were raised about inter-agency management arrangements, fire management, access policies and biodiversity conservation.
- **Nature conservation (Chapter 5):** This drew a body of mainly supportive comment, with a focus on protecting the natural values of the park (a key basis for its existence) and maintaining its contribution to regional ecological connectivity. More explicit references to climate change and conservation principles were suggested additions.

- **Fire management (Chapter 7):** Fire management attracted considerable comment, especially in relation to fuel/hazard reduction, access for fire fighting (fire trails), and biodiversity conservation. Fire management is probably the most contentious issue in the plan.
- **Recreation (Ch 8):** Recreation has the largest 'cluster' of issues. Some of these issues derive from conflict with management of other park values (especially protection of natural heritage and water supply). Some relate to the management of a particular activity in the park. Key issues include policies for: access to the Wilderness Zone; mountain bike riding; horse riding; rock climbing; events with large numbers of participants; commercialisation; possible new vehicle based campgrounds. It should be noted, however, that there is widespread support for the 'low key' approach to recreation in the park (though interpretations of this vary).

In conjunction with analysing the public submissions and incorporating material into the plan, the plan has been restructured in a number of ways:

- Within chapters, headings have been restructured to include a numbered third order heading;
- The former *Strategic Aims* are now *Primary Management Objectives*. Under this, *Objectives* remain, but *Strategies* are now *Policies and Actions* (this separates an underlying management position from more specific actions);
- The former *Issues and Opportunities* have been replaced by *Management Considerations*.

Other changes (e.g. revision and restructuring of Chapters 1 & 2 and a more comprehensive Statement of Significance) accord with comments made in submissions.

Overall, while the plan has been restructured, it contains some significant changes in policy detail (e.g. allows campfires in the Wilderness Zone, subject to permit and other conditions), and includes new or expanded material (e.g. on climate change), the broad policy directions expressed in the draft plan have been carried through to the final plan. This is considered to accord with the majority of views expressed in the submissions received on the draft plan.

2. Summary of Community Comments and Recommendations

(NOTE: Chapter headings below refer to those in the Draft Plan of Management. In the table, references to chapters and sections are to the revised plan.)

Summary of Community Comments	Government Response
Chapter 1: A new vision for the future	
<i>There was a relatively small amount of comment on this chapter, including that there should be a reorganisation of Chapters 1 & 2, which has been done.</i>	
(a) Precautionary principle: Support was expressed for the precautionary principle provided that it is applied as was originally intended i.e. to address the threat of serious or irreversible damage.	An additional management principle has been added (see <i>Limits of acceptable disturbance</i> s. 1.6) and this is reaffirmed by policies and actions for monitoring throughout the plan. A precautionary approach is particularly relevant to the management of Zone 2A (s. 3.2 and Table 3.1) to take into account the limited knowledge that has been gathered to date about the natural and cultural values of that zone.
(b) Cooperative management: There was general support for cooperative management of the park with the local Aboriginal community, but it was recommended that consultation with the wider community be undertaken before agreement about joint management arrangements is reached with Aboriginal parties.	Consultation arrangements are subject to the 2001 <i>Agreement between the ACT Government and Native Title Claim Groups</i>. No change to text.
(c) Role of the National Parks Association of the ACT: NPA (ACT) referred to its role in campaigning for 24 years for 'a national park for the national capital'.	Reference to the role of NPA (ACT) has been added to s. 1.2 (and elsewhere (s. 6.2.3, s. 8.2)).
(d) Wilderness: Support was expressed for identification of the remote and natural values of the wilderness and key principles for management.	The Statement of Significance (Table 1.1) contains a slightly expanded reference to wilderness (noting connections to areas in NSW). Text has been modified in s. 5.25 to s. 5.27, especially revised objectives and policies (s. 5.27).
(e) General comments: No other significant issues raised by respondents.	Amendments include minor text changes and reordering of information in Chapters 1 and 2. The Statement of Significance is now in Ch. 1. Important additions to the statement include water supply, fire (as ecosystem process) and Aboriginal heritage (in archaeological fabric).
Chapter 2: Introduction	
<i>There was a relatively small amount of comment on this chapter and no major issues were raised.</i>	
(a) Tourism: It was suggested that 'tourism' be included under the statement of significance in addition to recreation values.	Tourism may relate to a number of the values identified. It has not been included in the statement of significance. Text added to s. 1.4.5 and Ch. 8. Ch. 8 recognises nature-based tourism and includes policies for large-scale outdoor sporting events.
(b) ICOMOS: Include under international agreements ICOMOS (International Council on Monuments	Text added to 2.3.1 (c). See also s. 6.3.

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and Sites) and the Australian Charter for the Conservation of Cultural Significance (Burra Charter).	
(c) Values: It was proposed that the order of the values of the park should be expressed as environmental, social and then economic.	Text reordered to reflect the suggested order of values (s. 1.4)
(d) Aboriginal sites: Include reference to Aboriginal sites of significance.	Reference added to Statement of Significance Table 1.1
(e) Recreation: Support for licensing/permit system and recognition of impacts associated with overnight adventure tours.	These matters are addressed in Ch. 8.
(f) General comments: Various minor comments and recommendations.	Various amendments were made including minor text changes and some reordering of information from chapters 1 and 2 of the draft plan.
Chapter 3: Park Zoning	
<i>The chapter on zoning attracted a considerable amount of comment. Some of the issues raised are dealt with in more detail in subsequent chapters.</i>	
(a) General comments: In general the zoning system was supported.	The zoning for the park as outlined in the draft plan has been retained. However, the introduction to the chapter (s. 3.1) has been substantially rewritten, and the outline of key values in Table 3.1 expanded.
(b) Recreation zoning: An issue was raised as to whether the zoning related more to recreation than other management policies.	The purpose of zoning is explained in the expanded s. 3.1. The recreation policies table (former Table 3) is now placed in the recreation chapter-Ch. 8 (Table 8.2). The zoning chapter includes general management policies for the park related to the spatial arrangement of key park values (summary in Table 3.2)
(c) Zones: The accuracy of the zone descriptions and their alignment with the Cotter sub catchments was questioned and a proposal was put forward to realign the zones to closely reflect the sub catchment boundaries. Concern was raised about the possibility of the zoning system fragmenting natural areas.	No change has been made to zoning boundaries. Text in Chapter 3 has been amended to clarify the boundaries of the zones. The wilderness zone (Z 1A) is based on the <i>National Capital Plan</i> and the <i>Territory Plan</i> and it includes most of the upper Cotter catchment but does not include the area around Corin Dam. The other zones are determined by a range of factors such as the watershed of sub catchments, existing roads and the ACT/NSW border. The zoning system sets management policies and recreational use based on values at a broad level. It does not propose fragmentation on the ground through roading or any other means.
(d) Booth Range/Blue Gum: Some concerns were identified about this zone that are followed up in later chapters. The main issues and comments raised were as follows: - Proposals were put forward to reclassify the area as a wilderness zone (extension of Z1A). - Concern was expressed at the lack of scientific information about Booth Range Zone 2A (which was noted in the draft plan) particularly because policies in the plan allow for the area to be used for large	The final plan does not propose an expansion of existing wilderness area nor does it propose any new wilderness areas. The Booth Range and Blue Gum areas are valuable for their integrity as landscapes without roads and are suitable for recreational activities within a wild semi-remote setting. To take into account the limited knowledge that has been gathered to date about their natural and cultural values a precautionary approach to use of Zone 2A has been added to the text in s. 3.2.2 (a). Management considerations and policies relating to large group activities are contained in Ch. 8. The restrictions that apply to Zone 1A as wilderness and water supply catchment have not been applied to Zone 2A. Opportunities for a range of on-track activities simply do not exist

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group activities that could significantly impact on sensitive areas. Activities in the area should be restricted consistent with zone Z1A (Bimberi Wilderness).	due to the absence of formed roads (fire/management trails).
(e) Cycling: Some issues were raised in relation to this chapter and are followed up Chapter 8. There is opposition to cycling being permitted for management purposes in Z1A (Wilderness). One submission states that cycling should not be permitted in both Z1 and Z2.	The policies that were put forward in the draft plan have essentially been carried over in the final plan. A policy of not allowing cycling in the wilderness area has been maintained in accordance with the <i>Land (Planning and Environment) Act 1991</i>. This also aligns with the NSW policy of not allowing cycling in the Bimberi Wilderness. Management purposes has been redefined and is now included in the glossary of the plan. There is no justification for prohibiting cycling on trails/roads in Z1B (e.g. trails south of Bulls Head such as Warks Rd) and Z2 (e.g. Old Boboyan Rd, Smokers Flat trail).
(f) Roads/Trails: Concerns were raised about proposals to upgrade existing fire roads / fire trails and the construction of new roads and trails, especially related to fire management. One submission suggested that consideration be given to the decommissioning of roads in the Lower Cotter Catchment so as to improve water quality. Opposition was expressed to increased access for private vehicles and bicycles in wilderness areas.	The draft plan included maps from the Strategic Bushfire Management Plan (SBMP) and the final plan refers to the SBMP but does not include the maps (see s. 7.4.3). The reason for this is that there is a high probability that the SBMP will soon be revised and current fire zones and access proposals may change. An additional action—s. 4.6.3 action 3.7—allows for an evaluation of tracks and their impacts on water quality, particularly those tracks in the Lower Cotter Catchment. Fire trail access standards are included at Appendix 7. Provision of access tracks for fire management purposes will be guided by the ACT Strategic Bushfire Management Plan. With regard to bicycles and vehicles in the Wilderness Area, the special conditions under which they may be allowed are included in s. 8.7.4 (policy 39.24) and s. 8.8.1 (policy 39.74).
(g) Permit system: General support was expressed in some submissions for continuing the permit system for pack camping in the Wilderness Area (Zone 1A) while others believe there are too many restrictions on recreational use. Concern was expressed about increased emphasis on commercial activities in the park.	A permit system for the wilderness/catchment area has been carried over into the final plan. No change to text. Management of recreational use so as to protect other park values and to minimise conflict between types of users is outlined in Ch. 8.
(h) Gudgenby Homestead: Comments include both support for and opposition to use of Gudgenby Homestead for accommodation.	The plan allows for Gudgenby Homestead to be used for overnight accommodation. However, approval by the National Capital Authority would be required (see s. 6.3 and s. 8.6.1 (38.8)). The building will be managed in accordance with the conservation management plan.
(i) Memorials: It was proposed that the reference to permitting memorials be deleted.	Text has been amended to allow for a special memorials area within the Namadgi National Park Visitor Centre precinct (see s. 6.4.5 (21.7)). The final plan reaffirms the policy that the ACT Memorials Policy will guide policies in relation to NNP.
(j) Utility structures: It was proposed that the reference to allowing utility structures in Zones 1A, 2A and 2B be removed.	No changes have been made in relation to allowing utility structures in the park. Such structures may be required for water supply, fire detection, communication and for civil aviation purposes. It is not practical or legally feasible to apply a blanket policy of ‘no utilities’ to these areas.
(k) World Heritage: It was proposed that more prominence should be given to achieving World Heritage Listing (WHL) for Namadgi as part of the	The plan refers to supporting a nomination to the National Heritage List as part of a broader assessment of the Australian Alps National Parks (AANP), which is a mandatory preliminary step to WHL (see s. 6.4.1 (17.9)). There is no firm proposal to

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Australian Alps.	pursue WHL by the ACT Government or at an AANP level at this stage. The management plan contains no impediment to pursuing WHL should it be undertaken in the future. No change to text.
<i>(l) Definition of commercial/non-commercial activities:</i> Clarification and definition of commercial / non-commercial activities is required.	Text has been expanded to provide a more detailed definition (see s. 8.8.1).
<i>(m) Special events:</i> Should not be permitted in Zones 1B or 2A	There is no general exclusion of special events in Zones 1B and 2A, however, an objective has been added to s. 8.9 stating that permitted group and special events are to be consistent with the protection of park values.
Chapter 4: A place of water – water resource management	
<i>Amongst others, four organisations made substantial comment on this chapter. Catchment hydrology and management, water quality, fire, biodiversity conservation and their relationships were a particular focus.</i> <i>(a) Water Supply:</i> It was proposed that the plan should apply a greater emphasis to Namadgi's current and future domestic water supply function. Too great an emphasis is placed on biodiversity protection at the expense of water catchment management. A somewhat contrasting view is that the plan does not establish an adequate link between high conservation values and maintenance of a high standard of water quality.	Text changes have been made to strengthen the focus on water. Water is clearly assigned as the most important value and the highest priority for management in s. 1.4.1 and Table 1.1. The plan consistently recognises the importance of the Cotter Catchment as Canberra's domestic water supply. Other catchments in the park (i.e. Gudgenby / Naas Catchments) are also recognised for their importance for Canberra's future water supply. A broad spectrum of management requirements for water resources is addressed in the plan including catchment management, landscape and biodiversity conservation, fire management, recreational use, research and monitoring and environment protection. These are consistent with the policies and objectives of the <i>National Capital Plan</i> and the <i>Territory Plan</i>.
<i>(b) Performance measures:</i> It was proposed that the plan should include performance measures for water quality/catchment yield.	Performance measures effectively exist in ACT Water Quality Standards of the Environment Protection Regulations 1997 (Schedule 4). The catchment is a natural hydrological system and yield will vary in relation to climatic, hydrological and ecological factors. Timeframes for the implementation of actions identified in the plan have been included at Appendix 8.
<i>(c) Fire/catchment management:</i> A range of issues were raised about the relationship of fire regimes to catchment condition including: • effects on water quality and yield; • analysis of relationship SBMP and the management plan; • risks imposed by fire hazard reduction activities; • the need for proactive fire management in strategic parts of Cotter Catchment (mosaic burning) to protect water supply; and • the use of scientific research and monitoring.	Some considerations raised in this chapter are addressed in more detail in Ch.7. In general, the level of clarity that is sought with regard to fire management is not possible to resolve within the context of a management plan. Hence there is a strong emphasis in the plan on adaptive management and research and monitoring particularly in relation to fire (see s. 7.3.2 and s. 7.4.1). The effects of fire management on water quality and yield are discussed at s. 4.5.1 and s. 7.3.6; policies and actions are included at s. 4.6.3, (3.11 & 3.12); s. 7.4.1 (25.), s. 7.4.2 (26.2, 26.5). The plan refers to the SBMP for fire management strategies.

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<i>(d) Hydrology:</i> A view was put forward that the plan does not adequately recognise hydrological/water resource values.	Additional text has been included in the Statement of Significance at s. 1.4 to recognise the importance of water. Additional text has been added to the primary management objective at s. 1.5.1; the hydrology section 5.4.2; has been retained and policies and actions for the management of hydrological systems are at s. 4.6.3 (3.6) and in s. 5.6 (9.3).
<i>(e) Support to minimise land disturbance and nutrient loading within catchments</i>	Comments support policy directions in plan in Ch. 4 (Water) and Ch. 8 (Recreation).
Chapter 5: A place of Nature – landscape and biodiversity protection	
<i>There was a modest number of submissions on this chapter, in particular, from organisations and their members with an interest in natural heritage. Most of these organisations have a long association with the area that is now Namadgi NP.</i>	
<i>(a) General comments:</i> This chapter was generally supported with comments primarily relating to: wilderness, biodiversity conservation, grasslands, birds and pest species.	The chapter has been restructured with a more substantial introduction that includes concise sections on climate change (s. 5.2.1) and the conservation of biodiversity and geodiversity (s. 5.2.2).
<i>(b) Biodiversity Conservation:</i> It was proposed that the plan include a clear set of principles for biodiversity conservation and management directions.	New section included s. 5.2.2. Fire and biodiversity conservation has been given a higher profile in Ch. 5 with cross-references to Ch. 7 (see. s. 5.8, s. 5.11)
<i>(c) Climate Change:</i> It was proposed that the plan provide comprehensive coverage of the implications of climate change and policies and actions to address the impacts.	A new section addressing climate change has been included in the final plan at s. 5.2.1. The most important, practicable management responses to climate change are discussed e.g. limiting other stressors on significant ecological communities. Strategies that address climate change and aim to limit stressors are at s. 5.6 (9.3, 9.4), s. 5.9 (10.1; 10.4, 10.6, 10.7), s. 5.12 (11.1, 11.8), s. 5.19, s. 5.22, s. 7.4.2, and s. 9.7.
<i>(d) Birds:</i> It was proposed that the section on birds be expanded and that a species list of birds be included in Appendix 5.	The bird section has been expanded especially in relation to habitat requirements, migration, the effects of the 2003 fires and threatened species. Appendix 5 includes a bird list (kindly supplied by the Canberra Ornithologists Group).
<i>(e) Grasslands:</i> It was proposed that more emphasis about natural grasslands be included in the plan as the subalpine/montane areas of Namadgi (and throughout the world) are significant for their grassy ecosystems. More survey is needed and key threats identified.	New information about grasslands has been included in s. 5.7. Survey and monitoring is addressed in s. 5.9.
<i>(f) Pest plants & animals:</i> There was general support expressed for pest plant and animal control programs including the control of feral horses. Concerns were raised by the rural sector about the adequacy of the programs currently being conducted.	Changes include minor text amendments. The concerns expressed by the rural sector are focussed on the extent and the effectiveness of implementation programs for pest plants and animals rather than the policies as they are defined in a management plan.

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(g) Wilderness: Proposals were put forward to extend the wilderness areas in the park to include: - the Middle Cotter Catchment; - the Booth Range and Mt Clear area; and - the Tennent / Blue Gum area. These proposed extensions are based largely upon the NSW Southern Comprehensive Regional Assessment Project: Wilderness Assessment Project (Draft National Wilderness Inventory Map). The policies suggested to accompany the extended wilderness propose limited recreational use, restricted largely to bushwalking.	The plan does not propose an extension of the wilderness area or the establishment of any new wilderness areas. The Middle Cotter Catchment has a high level of protection as a water catchment area. The Booth Range and the Tennent / Blue Gum areas are core areas of Zone 2 identified as Wild Semi Remote areas in recognition of their value as landscapes without roads and their suitability for recreation activities that require a remote setting. Some of these activities include group activities and nature-based events. The activities are not permitted in the Bimberi Wilderness (Zone 1) primarily due to water catchment values. The Blue Gum area is noted in the plan as particularly important for biodiversity values while the biodiversity values of the Booth Range, at this stage, are largely unknown. In recognition of these factors the plan puts forward a precautionary approach to the use of Wild Semi Remote areas (s. 3.2.2a).
(h) It was proposed that guidelines for threatened fauna species management be included.	This would be a duplication of existing Recovery Plans (Cwlth) and Action Plans (ACT). The plan (s. 5.9 and s. 5.12) refers to these documents.

Chapter 6: A place of past and present meaning - protecting and managing cultural heritage

<i>There was a modest number of submissions on this chapter, in particular, from organisations with an interest in cultural heritage. Most of these have a long association with the area that is now Namadgi NP.</i>	
(a) Native title: One submission put forward a belief that native title was not sufficiently addressed in the plan and that the 2001 Agreement between the ACT Government and Native Title Claimants (s. 1.5) is an act of discrimination. Other submissions noted the need for a careful transition to joint management and Aboriginal cultural activities that reinforce conservation. There were many comments supporting cooperative management and opportunities for Aboriginal people to be involved in the management of the park. An individual submission from an Aboriginal person suggested the right to camp and live in NNP for any period.	No amendments made in response to these comments. The cooperative management arrangements are subject to the <i>2001 Agreement between Native Title Claim Groups and the ACT Government</i>. The question of special Aboriginal access is addressed in s. 6.4.5, noting that access protocols would need to consider a number of issues including protection of the range of park values (as set out in the plan).
(b) Cultural heritage management/conservation: (i) It was proposed that a detailed plan for cultural heritage management should be included in the management plan to ensure a commitment to maintain/repair sites	(i) No significant changes have been made to the text as detailed planning for cultural heritage conservation would flow from the management plan rather than being included in it. Consistent with the draft plan, the final plan proposes that Conservation Management Plans be prepared for significant sites or groups of sites and that management of heritage places is in accordance with relevant legislation and the Burra

Summary of Community Comments	Government Response
and involve the community in such projects. (ii) It was proposed that more emphasis should be placed on Bendora Arboretum, Bulls Head and Mt Franklin Chalet sites as places of heritage and learning.	Charter (s. 6.4.1). (ii) Section 6.2.2 provides an overview of European cultural heritage values including those associated with forestry (s. 6.2.2 (d)). Text about the arboreta has been added here.
(c) Aboriginal heritage sites: Support for systematic cultural heritage surveys was expressed. It was noted that some heritage places were omitted from Appendix 6.	Support for surveys noted. No text changes made. Appendix 6 includes only places that are currently listed on the ACT Heritage Places Register. Some significant sites in Namadgi have not yet been placed on the register and therefore the list may appear to be inadequate.
(d) European sites: It was proposed that a more systematic approach be taken to the conservation management of European cultural heritage.	This issue is adequately covered in s. 6.4.7. No text changes made.
(e) Community involvement: The importance of partnerships in cultural heritage management is referred to in several submissions. One submission stated that experience shows that MOUs may clarify the roles of community groups.	Community involvement in cultural heritage management is adequately covered in s. 6.4.1 (Policy 17.3) and s. 6.4.5 (Action 21.5). Chapter 10 (s. 10.5.1) contains policies relating to community participation including the establishment of agreements. No text changes made.
(f) ACT Border markers: It was suggested that both new and old survey markers need to be appropriately protected when any new fire trail or other works are undertaken. Most border markers were lost in the 2003 fires. These have significant heritage value and are also a legal entity that define the ACT/NSW border.	Text has been amended to recognise the heritage value of markers in s. 6.6.6 (b) and (f) and management actions are included in s. 6.4.2 (Action 18.13).
Chapter 7: A place of fire - fire management	
<i>This chapter attracted considerable comment, especially in relation to fuel/hazard reduction and access for fire fighting (fire trails).</i>	
(a) Information: A view was put forward that the plan does not include scientifically based information that could give some policy leads on vegetation, fuel and catchments, noting that this information is available for similar landscapes in NSW and Victoria.	This level of detail has not been addressed in the management plan for NNP. It is considered more appropriate that the ACT Strategic Bushfire Management Plan or the Bushfire Operational Plan address issues relating to fuel characteristics as part of the assessment of bushfire risk. The Emergencies Act specifies that the SBMP plan must include <i>a risk assessment of factors contributing to bushfires and the spread of bushfires</i> .
(b) Mosaic burning: It was suggested that a primary management objective for fire management should be the creation of a mosaic of areas across the park with differing fire histories and a consequent diversity of vegetation age-classes.	This has been added as a second primary objective at s. 7.1 and s. 1.5.4. The preparation of an appropriate strategy is Action 28.2 (s. 7.4.2).
(c) Minimum fire intervals: Concern was expressed about the minimum fire intervals for ecological communities in Namadgi NP as outlined in Map 8 of the	Section 7.2.1 has been expanded to better explain the known history of fire in the Brindabella Range and some of the implications for current fire management. Section 7.3.1 has been expanded to include more discussion about fire regimes.

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SBMP, <i>Minimum Fire Intervals for Ecological communities</i> and the potential for these to conflict with fire regimes deemed appropriate for specific areas of the park.	However, there is a limit to the detail that is appropriate for a management plan¹. The minimum fire intervals map is part of the Strategic Bushfire Management Plan and is not included with the Namadgi National Park final draft plan. Section 7.4.2 includes policies relating to the application of ecologically-based fire regimes. 1. Sections 7.2.1 to 7.3.5 contain some key references on fire ecology (e.g. CSIRO 2003), that can be referred to for elaboration of material in the concise sections of the management plan.
(d) Fuel reduction: Submissions were divided into those that give priority to fuel (hazard) reduction and those that take an ecological view, although both see the need for fire management to be based on ecological knowledge. There was support for the use of fire for vegetation management. The difficulty of applying burning regimes due to terrain and the need for experienced staff is noted in some submissions. The impact of fire regimes on hydrological values is raised. Several submissions expressed concern about the ecological impacts of fire if there is too frequent burning.	Section 7.3 has been expanded to include a broader discussion about biodiversity and fuel reduction and the use of fire as a management tool. However, the inherent complexity of this issue makes it impossible to be resolved within the context of a management plan. For this reason the plan advocates an adaptive approach to fire management that is underpinned by research and monitoring so that the outcomes of fire management strategies are continually assessed and the appropriate policy adjustments made. The final plan continues to make a firm commitment to fuel reduction in accordance with the SBMP. (See also note above on references that can provide further information.)
(e) Suppression: It was suggested that the draft plan did not make fire suppression the priority to the extent agreed following McLeod Inquiry and SBMP and that there is a need for the plan to recognise the importance of suppression.	The draft plan made a substantial commitment to fire preparedness for the advent of fire in s. 7.4.3 including the provision of adequate resources, infrastructure, equipment and personnel for suppression operations and also training and skills development for staff involved in any aspect of fire management. No changes to the text were required.
(f) Procedures: It was suggested that Action 34.1 would introduce procedures not achievable in an early attack situation.	Much of the information required in relation to sensitive areas and natural, cultural and infrastructure assets will be documented well before a fire event. The transfer of this information is dependent upon operational procedures and the involvement of land managers in fire suppression. No changes to text were made.
(g) Fire foams and retardants: The use of fire retardant chemicals in sensitive environments should be discouraged.	Additional text has been added to section 7.4.5 under Objective 34, Action 34.1. The section includes actions for catchment protection during fire fighting operations. It also includes a new precautionary policy on the use of chemicals near water bodies and continues the proposal to develop detailed policies in collaboration with ACTEW, EPA and ACT Health in relation to the use of fire suppression chemicals in the water catchment.
(h) Access: Submissions include both strong support for, and opposition to, new trails/upgrades. Fire trail maintenance was raised as an important management function.	The final plan continues a commitment to providing an appropriate level of access for fire management purposes (see s. 7.4.3). The map from Version 1 of the SBMP (proposed fire trail upgrades and new trails map) is not included in the final plan as it is likely to be reviewed in the near future. The trails included on the map are currently being built or are the subject of preliminary assessments that are in preparation. The final NNP management plan refers to the SBMP for fire management strategies (27.1). Appendix 7 outlines condition, use and status of roads and tracks in the park.
(i) Cross border/boundary issues: It was suggested that the wider landscape approach identified in the Australian	Cross border/boundary issues are considered to be adequately addressed in the draft plan and have been carried over to the final plan (see s. 7.4.4 (b) of final plan). A regional fire risk assessment

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Alps Fire Management Principles were not adequately addressed in the draft plan and that park boundary issues were not sufficiently addressed. It was suggested that a regional map be included showing external elements of threat to park.	map is included in Version 1 of the Strategic Bushfire Management Plan (Map 3) and therefore it is not considered necessary to include this information in the Namadgi Management Plan. No change was made.
(j) Fire history/background: It was proposed that more information should be included in the fire history section of the management plan.	Text in the fire history section has been expanded (s. 7.2.1).
(k) Camp fires: It was suggested that the restriction of campfires is excessive. In particular, some submissions suggested that a 'fuel stove only' policy for the wilderness areas was too arduous for park users during the winter months when a campfire is necessary to keep warm.	The policy on campfires has been amended to allow campfires in the open in the Wilderness Area, Zone 1A (subject to permit) except during the fire season when fire will only be permitted in designated fireplaces (see 7.4.3 (d)).
(l) Birds: The particular requirements of some bird species and the implications of fire regimes on their habitat requirements were highlighted.	The bird section at s. 5.10.7 has been expanded to include habitat requirements, migration, the effects of the 2003 fires on threatened species.
(m) Hydrology: It was suggested that the relationship between fire hazard reduction and hydrological values and maintenance of hydrological integrity needs discussion and policies.	Additional text has been included in final plan at s. 7.2.2 and s. 7.3.6 and catchment management is the focus of Action 27.2. Consistent with the draft plan, the final plan includes hydrology in the primary management objective at s. 1.5.1, and a section dedicated to <i>Hydrology</i> at 4.6.3 that addresses policies relating to fire, fire trails and hydrological elements of the landscape.
Chapter 8: A place for community wellbeing - recreation and visitor use	
<i>This chapter attracted a large number of often long and detailed responses. Many were similar to one another.</i> (a) General: A broad range of views was put forward in relation to recreational use of the park. Some general comments/perspectives were: - recreation is a secondary consideration to conservation of natural values; - a low key approach to recreation is appropriate for Namadgi National Park and is generally supported; - the draft plan is overly restrictive for some recreational users; - there were conflicting views about (a) allowing special events (some with large numbers of participants), (b) access by commercial tour operators, and (c) cycling access; - there was no support for built	Introductory text for Chapter 8 was reviewed and some minor changes made to clarify the general issues raised. Most comments made in relation to this chapter are addressed at the specific activities below.

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accommodation in the park, except for reuse of Gudgenby Homestead (not agreed by all); vehicle access to main day use areas (as at present) is supported. Several additional minor points and corrections were proposed in submissions.	
(b) Built accommodation: A range of divergent views was put forward in relation to built accommodation. Most comments were focused on the adaptive reuse of Gudgenby Homestead precinct. They included: - agreement with the policy in draft plan that Gudgenby Homestead should be used for low-key accommodation and be managed by the parks agency, - a view that the homestead should not be for commercial accommodation (concessionaire) and that use should be low-key; - that Gudgenby Homestead and precinct should only be used for park staff accommodation; - that Gudgenby Homestead offers the opportunity for private sector investment; - the <i>National Capital Plan</i> policy is that Gudgenby Homestead can only be used for park purposes; - that Gudgenby Homestead could be used by community groups; and - that Gudgenby precinct could be a gathering place for events.	The final plan carries forward the policies of the draft plan that Gudgenby Homestead precinct offers opportunities for overnight accommodation for a range of park users and could be managed on a model similar to Currango Homestead in Kosciusko National Park. However, to allow for eventualities that may arise over the life of the plan, the policy in the final plan has been broadened to allow for other management models to be considered. The policy (38.8 in s. 8.6.1) allows for the homestead <i>to be managed according to a lease arrangement. Appropriate guidelines would need to be developed for use of the site to protect cultural heritage values</i> (see also s. 6.3 Recreation and Tourism). The final plan (s. 8.6.1 (b)). also includes an additional note that use of the Gudgenby Homestead for overnight accommodation would require consultation with the National Capital Authority in relation to the requirements of the <i>National Capital Plan</i> (Appendix G), for <i>Namadgi National Park and Adjacent Areas</i> which states that ‘Gudgenby Homestead is to be used for park purposes’.
(c) Wilderness/Zone 1A: Broadly, comment polarises between restrictive and less restrictive views. They included: - support for and opposition to disallowing cycling in the Z1A; - support for and opposition to the continuation of a permit system for overnight bushwalking in Z1A; - opposition to access by commercial tour operators contributing to ‘a wilderness management project’; and - support for restrictions of aircraft flight over the wilderness.	No significant changes were made to the draft plan. - The final plan continues a restriction on cycling except for management purposes¹ in Zone Z1A in accordance with the <i>Land (Planning and Environment) Act 1991</i>. - The final plan continues the policy of a permit system for overnight bush walking in Zone 1A (Upper Cotter Catchment) with a restriction of 24 walkers in the catchment at any one time (see s. 8.6.1(g) and Policy 38.18). - The possibility of this access has been retained but the conditions and purposes defined (s. 8.8.1, Policy 39.71). - The final plan continues to seek restrictions on low altitude flight over the wilderness area but clarifies that this needs to be in accordance with Civil Aviation Authority regulations. However, personal flight craft can and will be managed according to the provisions of the management plan. Hang-gliding and paragliding is not permitted in Zone 1 of the park and, subject to permit and licensing, is allowed in other areas. See Section 8.7.13 for <i>Flying</i> policies.

¹ Management purposes has been defined in the glossary in the back of the final plan (p 212).

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(d) Group and special events: <i>Group size:</i> There were comments in support of encouraging small groups for dispersed overnight camping although some submissions did not support a permit system. There was support for small group sizes (8–20) for overnight bushwalking groups (internally some bushwalking organisations adopt eight as the preferred maximum). <i>Events:</i> Detailed submissions were presented by individuals and organisations involved in large sporting events (e.g. rogaining, orienteering) outlining their history of running events in the park and their concern to minimise environmental impact. Many other submissions questioned the appropriateness of such events and the size of events that should be permitted in the park with several references made to the inadequacy of Schedule 3 of the draft plan as a guide for event management. Submissions put forward the view that the size of events permitted in Schedule 3 were too large while others felt they were too restrictive. It was suggested that particular large events such as The Great Australian Bushwalk and police and defence training should not be held in NNP. It was also suggested that large off-track events be undertaken in Zone 3 (north-west NNP) and that access nodes be designated, zoned and managed to cater for large numbers of vehicles attending such events. There was both opposition to and support for the policy that event organisers may be charged a bond.	<i>Group size:</i> The draft plan did not provide a maximum number of overnight walking permits for Zone 1A (Wilderness and Upper Cotter Catchment) but did state that numbers would be limited. The final plan sets a limit of 24 permits (24 people) at any one time, which is consistent with the policy of the previous management plan (s 8.9(a), Policy 41.1). A limit has not been set on the size of groups for Zone 1A. However Policy 40.2 advocates the encouragement of small group sizes (10 or fewer) for dispersed camping. Management will determine the size of groups to be permitted. <i>Events:</i> The special event policies in the draft plan have been revised. Rogaining, Orienteering and Mountain Running have been assigned a separate section in the plan (8.7.14) and policy for special events is in s. 8.9(b). Schedule 3 has been removed from the document. There is no specification of the size of events permitted in the park. The policy at 8.9(b) outlines criteria for management to take into account when considering a permit for an event in the park.
(e) Ecotourism/cultural tourism/tourism operators: Comments made in relation to tourism were: • Namadgi presents opportunities for new ecotourism experiences; • ecotourism encourages ‘participation in conservation’; • ecotourism operators should be provided with access to access Z1 (Cotter Catchment); • the importance of ecotourism for supporting research programs; • the need to provide an ongoing development program for ecotourism; • a limited number of commercial operators should be licensed for a	Text in s. 8.2.1 has been expanded. Opportunities for supporting such tourism venture are covered in Objective 22 (s. 6.4.6), s. 8.8 and Chapter 9. As per the draft plan, the final plan allows for special access arrangements to management trails for tour operators to all zones except Zone 1. Vehicle access by commercial tour operators to Zone 1 may be considered and approved by the Conservator only in exceptional circumstances, where access is necessary to contribute to a wilderness or catchment management project that is approved and supervised by park management. Access to defined management trails in Zones 2 and 3 may be permitted subject to written consent from the Conservator and licensing arrangements. Accreditation of operators has been added to Policy 39.72. All other policies in the draft plan relating to commercial activities are essentially unchanged.

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maximum 2 years and pay fees to use the park; the economic benefits of tourism; and concerns about commercial activities (special access privileges being proposed s. 8.8.1), and the ability of park managers to meet operational requirements to manage tour operators such as accreditation, administrative costs, impact of commercial groups and the provision of an education program for operators.	
(f) Recreational driving (includes. 4WD): In general there was support for the policies put forward in the draft plan relating to recreational driving although some concern was expressed about the possibility of allowing private 4WD access to management trails for management purposes i.e. management trails should strictly be used only by management personnel. Others felt that management trails should be open for 4WD clubs and enthusiasts. Some submissions did not agree with the proposal to upgrade Bendora Road and a road north of it for a tourist drive. It was suggested that large numbers of 4WDs present a danger to others as well as having a high impact on the environment.	All of these comments were noted but no changes were made to the <i>Recreational Driving</i> policies in the draft plan (see s. 8.7.1). There is a need for management to ensure that access to management trails is strictly controlled to reduce the likelihood of illegal activities such as hunting, arson and damage to park infrastructure. Most management trails are not designed for heavy use and they are particularly prone to damage when wet. Section 10.5.1 provides for community groups, including recreation groups such as 4WD clubs, to be actively involved in park management activities. The definition of 'management purposes' is included in the glossary at the back of the plan.
(g) Picnicking/sightseeing: A suggestion was made that there should be more view stops on roads.	Text has been added to the final plan to specify that Zone 3 allows for appropriate turning bays, vehicle parking, lookouts and interpretive signage (39.7).
(h) Walking (Bushwalking): Comments included: (i) opposition to 'licensing' or permit arrangements for walking; (ii) permits for (Z1A) should be based on 4 people per vehicle therefore 8 people per group should be the maximum; (iii) general support was expressed for the development of a track strategy; (iv) Support for walks with interpretive signage;	(i) The final plan retains a policy for a permit system for the Upper Cotter Catchment (Bimberi Wilderness) (s. 8.6.1 (g), Policy 38.18) and the option to apply permits to other areas of the park if considered necessary in the future. (ii) The final plan provides for a limit of 24 people in Zone 1A (Cotter Catchment/Wilderness Area) at any one time but does not specify group size (Policy 38.18, see also s. 8.9, Policy 41.1). Park management will determine the appropriate group size for the catchment. The final plan retains the policy for the encouragement of a maximum group size of 10 walkers for other areas of the park and allows for a permit system to be implemented should a need arise. (iii) The final plan retains the policy to develop a track strategy for the park. Policy 39.17 allows for the planning for new walking tracks to be considered for other uses such as cycling and fire management. (iv) Interpretation is included in Ch. 9.
(i) Mountain biking: A range of views were put forward in relation to mountain biking as follows: (i) cycling should be permitted on	(i) The policy of disallowing cycling south of Mt Ginini Carpark and in the wilderness area (the latter in accordance with the <i>Land (Planning and Environment) Act, 1991</i>) has not changed.

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formed trails in the wilderness area; (ii) appropriate narrow trails (walking tracks) should be accessible to mountain bikers and opposing view that bicycles should be excluded from walking tracks.; (iii) multi-use trails travelling past areas of historical, cultural, environmental interest should be developed; (iv) the Bicentennial Trail is not designed to contemporary standards for mountain biking; (v) the notion that mountain bikes are hazardous to walkers was challenged, (vi) a clarification of bicycle access to for Zone 1A for 'management purposes' was sought,	(ii) The final plan continues to disallow cycling on walking tracks due to the fact that walking tracks have not been designed and built to a suitable standard for bicycle use and multi-use. (iii) Policy 39.26 has been amended to include <i>Cycling may be permitted on multi-use tracks if they are constructed to accommodate bicycle traffic</i>. Policy 39.17 proposes that the development of a walking track strategy include the consideration of the <i>potential of [walking] tracks for other uses such as cycling and fire management</i>. (iv) Text has been added acknowledging that the Bicentennial Trail has limitations as a cycle route (s. 8.7.4). (v) Mountain bikes could be hazardous to walkers if they are travelling at speed and therefore no change to text has been made. (vi) Access for <i>management purposes</i> is now defined in the glossary at the back of the final plan.
(j) Motorised biking: There was general support for the confinement of motorised biking to public roads only.	The issue was adequately covered in the draft plan (see s. 8.7.5 of the final plan). No change to text.
(k) Horse riding (incl. Bicentennial National Trail (BNT)): Main issues and proposals raised were: (i) that the BNT be re-routed from Yaouk to Mt Clear (land owners should be consulted). (ii) both support and opposition was expressed in relation to the rerouting of the BNT away from Boboyan Rd. (iii) both support and opposition was expressed for an upgrade of Mt Clear Pound Campground. It was proposed that access to the Mt Clear Campground be controlled via a locked gate. (iv) Both opposition and support was expressed for the restriction of horse riding to the east of Old Boboyan Road. (v) It was suggested that a corridor rather than formed trail (less impact, less chance of weed establishment) could be established for the new section of the trail. (vi) It was proposed that the reference to horses spreading weeds be deleted as it is not supported by research. (vii) It was suggested that the number of horses be restricted to a maximum of 10 horses per group. (viii) Some submissions put forward the	(i) The draft plan has been changed to allow for the relocation of the section of the Bicentennial Trail on the Boboyan Road between the Mt Clear Campground intersection and the ACT/NSW border and along the southern boundary of the park. The route of the proposed new Grassy Creek Fire Trail will be trialled to provide a safe off-road route for horse riding (see s. 8.7.6, Policy 39.31 and Action 39.37). (ii) The BNT will be rerouted away from Boboyan Road along a newly constructed Burnt Hill Fire Trail due to safety considerations for horse riders. (iii) The Action to upgrade of the Mt Clear Pound Campground has been retained in the horse riding section (see s. 8.7.6, Action 39.39). The plan does not include any specific policies in relation to management of the campground. Such arrangements are operational matters and are too detailed for a management plan. (iv) Horse riding will continue to be restricted to the east of Old Boboyan Road except for allowing access to the Grassy Creek Trail south of Old Boboyan Road. Access to the Grassy Creek Trail will be permitted once the new trail is constructed and will be subject to continuing right of passage by private landholders. Access to the Grassy Creek Trail will be reviewed following a trial period. Following the trial period, a review of the route may be triggered should environmental impacts, access and compliance issues arise. (v) The new section of the trail will be located on fire trails to provide a suitable standard of access for all users e.g. cyclists, walkers and horse riders. (vi) There is sufficient scientific evidence to support the premise that horses introduce weeds (see Dyring 1990; Weaver and Adams 1996; Whinem <i>et al</i> 1994; Royce 1983). (vii) The draft plan proposed that small group sizes will be

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view that they were in general, opposed to horse riding in national parks. (ix) It was proposed that 'clean feed' for horses should be clarified.	encouraged and may be enforced by a permit (Policy 39.33). No change to text. (viii) Horse riding in Namadgi National Park is limited to areas where the impacts on sensitive ecological communities can be minimised e.g. areas previously used for farming, and is restricted to management trails. (ix) Text expanded at policy 39.32 to include a clarification of clean feed.
(l) Snow activities (downhill skiing, ski touring, snow play): General support was expressed for the snow-based policies and strategies in the draft plan. There were a few suggestions that skiing facilities be developed.	Support for the policies in the plan was noted. The only change to the text (s. 8.7.8 and s. 8.7.9) was to add 'tobogganing' and 'snowboarding' to Policy 39.40 and add that 'no specific facilities will be developed for these activities.' This clarifies that these activities are allowed in the park. (The Plan notes the limited suitability of the park for skiing and the more suitable locations and infrastructure in Kosciusko NP.)
(m) Rock climbing: (i) Some submissions agreed with the general thrust of the statement <i>that park managers cannot take responsibility for the safety of participants who engage in high-risk activities.</i> (ii) Some submissions disagreed that rock climbing is high risk. (iii) Both opposition and support was put forward for a 'no camping' policy at Booroomba carpark. (iv) Numbers of climbers in NNP have declined in recent years as climbers have tended to go elsewhere. (v) Some submissions disagreed with the impacts of climbers as outlined in the draft plan. (vi) Both support and opposition to permits for rock climbers was expressed. (vii) Concern was expressed about proposed signage at the base or top of climbing areas. (viii) Opposition to the section on bolting (removal old/no new bolts and fixed anchors) was expressed due to a compromise in the ability of climbers to manage risks and safety issues. (ix) It was proposed that the long association that climbers have had with NNP heritage for generations of climbers be noted in the plan.	(i) Noted. (ii) Introductory text on visitor safety at s. 8.5.2 has been amended to take into account the competency of those undertaking an activity as a significant factor in mitigating risk. (iii) The draft plan allows for pack-based campgrounds (primitive bush campgrounds) to be established where dispersed camping is causing unacceptable impacts (see 8.6.1(g)). A new action has been included in s. 8.7.10 (Action 39.52) allowing for an evaluation of the establishment of a small walk-in bush camping area in the vicinity of, but away from, the Booroomba Rocks carpark. (iv) Text in s 8.7.10 has been amended to correct information about numbers of rock climbers using NNP. (v) Amendments have been made to the text taking on board some of the detailed points made in relation to impacts caused by rock climbers. (vi) Policy 39.50 allows for a permit system to be introduced if self-regulation is ineffective. (vii) The policy in the draft plan relating to signage has been removed from the final plan. (viii) Text has been amended to allow for the replacement of rock bolts and fixed anchor points or for new ones to be installed according to a code of practice (see Policies 39.47 and 39.51). (ix) Noted. No change to text. More detail than necessary.
n) Fishing and hunting: There are no submissions related to these activities generally. A small number of submissions opposed policies allowing Aboriginal hunting of animals or collecting of plants or stated that hunting and gathering by Aboriginal people should be by traditional methods only.	Noted. This issue is covered in s. 6.4.5 (Action 21.3 and Note with that action) and s. 8.7.11 (Policy 39.54). No change to policies made.

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o) Boating, canoeing, kayaking, rafting: General support was put forward for this section. One submission proposed that water activities below Bendora Dam (outside of the park) be prohibited.	Support noted. The plan addresses only those areas within NNP.
p) Flying: A range of comments were submitted in relation to flying as follows: (i) A view was put forward that hang gliding is not appropriate for NNP. (ii) It was proposed that access to management trails for flying activities should not be allowed. (iii) It was proposed that particular sites and events should be nominated in plan (rather than being general). (iv) Support was put forward for restricting, where possible, low level flying over remote areas, in particular the wilderness area. (v) It was proposed that hang gliding should operate under the same conditions as kayaking or rafting (i.e. not require permission from park management). (vi) A view was put forward that flight safety is a matter for pilots (sites and pilots are rated) and that safety is covered by pilots being members of the Hang Gliding Federation. (vii) It was proposed that to avoid ambiguity 'paragliding' should be inserted 'after' 'hang gliding'. (viii) There is opposition to permitting joy flights over the park.	(i) Noted (see s. 8.7.13). There is no justification for disallowing hang gliding in the park. No change to policy. (ii) This is not agreed and the policy has been amended to allow licensed tour operators access to management trails for flying (Policy 39.62, see also s. 8.8.1). The policy allowing access for community events has been retained (Policy 39.62).. (iii) It is not appropriate to include the details of particular sites or events suitable for flying as any proposals would need to be subject to an appropriate level of assessment. No change to text. (iv) Support for restrictions to curb noise impacts noted. (v) Park management requires a permit for flying activities so that potential conflicts with other park users can be managed. No change to text. (vi) Park management must consider all aspects of safety including the competency of operators, safety issues that may arise from park management activities e.g. control burning, and the safety of park users. No change to text. (vii) Text changed as suggested. (viii) Policy 39.64 and Action 39.65 in relation to the wilderness and remote areas of the park are relevant, however park management does not have the power to prohibit flights over the park.
q) Orienteering, rogaining, mountain running: Comments by organisations and individuals were divergent in relation to orienteering and rogaining events in NNP. A view was put forward by some that only small events comprising 10 to 20 people should be allowed in the park while others argued that a limit of 600 participants (as proposed in Schedule 3) for an event was unacceptable stating that there is no evidence that these sporting activities have any environmental impact. Supporters of orienteering and rogaining argue that the potential for impacts can be ameliorated through cooperative and detailed planning with park management. It was also noted that impacts should be assessed through a scientifically designed monitoring program that will help to formulate more	The special event policies in the draft plan have been revised. Rogaining, Orienteering and Mountain Running have been assigned a separate section in the plan (s. 8.7.14) and policy for special events is in s. 8.9(b). Text relating to ameliorating the potential for environmental and social impacts of events has been included in s. 8.7.14 and the importance of careful planning and monitoring has been highlighted. Schedule 3 has been removed from the document. There is no specification for the size of events that will be permitted by management. This responsibility lies with operational management. The policy in s. 8.9(b) outlines criteria to be taken into account when considering a permit application for an event in the park and this will provide the necessary guidance for management decisions.

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detailed policies for operational management. It was suggested that NNP is the only site in the ACT where long (12-24 hour) events can be held.	
r) Camping/camp grounds: Overall, there was broad support for the camping policies applying in the park and for camping to remain 'low key'. Particular issues were; (i) Closure of camping at Booroomba rocks car park. Prohibition on camping at this site was opposed by rock climbers. (ii) Concerns about the Mt Clear pound campground (used by horse riders and large groups), related to inadequate facilities, occasional overcrowding and conflicts between user groups. (iii) Opposition to the possibility of vehicle based campgrounds in Gudgenby and Ororral valleys	The sub-sections on camping have been slightly reorganised in the plan (s. 8.6.1 (e, f, g). Camping policies related to some activities are also at: 39.38, 39.39 (horse riding); 39.52 (rock climbing at Booroomba); 39.74 (commercial tour operators); 41.1 to 41.5 (group activities). (i) The plan has been amended to include the evaluation of the establishment of a small walk-in bush camping area near Booroomba Rocks carpark (s. 8.7.10, Action 39.52); (ii) The plan contains an action to redesign and upgrade camping facilities at Mt Clear Pound campground; (iii) The possibility of new campgrounds in these areas has been retained (Policy 38.16), subject to demonstration of need, environmental and risk assessment. (iv)
Chapter 9: A place for learning - communication, information, interpretation, education and research	
<i>This chapter attracted a relatively small number of responses.</i>	
a) A place of learning: There was a strong level of support for management of Namadgi to be founded on a sound knowledge base and the park to be a place where people are encouraged to learn about natural and cultural heritage. The important link between survey, monitoring, research and adaptive management is noted.	Only minor changes were made to this chapter. A second primary objective was added: Survey, monitoring and research programs in Namadgi provide knowledge and understanding that underpin park management. A distinction is made between survey, monitoring and research (s. 9.6).
b) Climate change: A number of submissions dealt in some detail with climate change (e.g. factoring climate change impacts into management of biodiversity and need for a knowledge base in relation to this). It was suggested that the Plan should identify management actions to improve ecosystem resilience and adaptive capacity.	There is substantial reference to climate change in Ch. 5 including a new s. 5.2.1.(see also s. 5.2.2 and s. 5.11). Climate change is included in Action 47.6. In s. 9.7 it is noted that a collaborative approach across the Australian Alps with regard to climate change impacts will be most effective (see Policy 47.2).
c) Survey, monitoring and research: It was suggested that the strategic aim for this chapter needed a research objective and that the plan needed a section on research being undertaken. It was suggested that there should be a defined,	As noted above a second primary objective has been added. The plan (s. 9.6.1) contains a (necessarily) concise summary of scientific research carried out in the Namadgi area since the early 20th century. There is also relevant material in Ch. 5 (s. 5.2 to s. 5.4).

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costed and funded research and monitoring program that addresses the management needs of the park. The need for surveys (natural and cultural heritage) in parts of the park e.g. Booth Range was noted.	Section 9.8.1 contains policies and actions related to survey, monitoring and research. As noted above a distinction is made between survey, monitoring and research (s. 9.6). Survey needs are identified in s. 9.8.3.
d) Interpretation: Support was expressed for updated displays, face to face interpretation, and for innovative ways to meet increasing demand for interpretive services. It was suggested that the plan should include specifics for interpretation/education. It was suggested that it would be more effective for park managers to work with education providers rather than attempt to provide education services. Support was expressed for Aboriginal cultural tourism as part of interpretation. It was suggested that tour operators should meet certain standards regarding knowledge of the park.	No major changes were considered necessary in this part of the plan (s. 9.3 to s. 9.5), however, it has been slightly amended and reorganised. An Action (42.4) is to review the interpretation strategy. It is not feasible to incorporate this level of detail in the plan. S. 9.5.5 refers to Aboriginal cultural tourism. Policy 43.1 refers to assistance to tourism operators with regard to accreditation, information on park values, and recreational codes of practice.

Chapter 10: A place with community - neighbours, community groups and volunteers

A small number of submissions commented on this chapter.	
a) Rural leases: A number of matters were raised regarding the interface between the park and rural leases: (a) the lack of reference in the plan for lessees to be good neighbours to the park (i.e. to ensure their activities do not impact on the park); (b) the need to maintain boundary fences; (c) the potential for neighbours to provide accommodation and tours; (d) concern for management of woodland adjacent to the park; (e) the responsibility of park managers to manage the interface; (f) the suggestion that neighbours should not be allowed to enter the park on horseback or with dogs to return their straying stock. Park staff should remove stray stock.	Some of these matters are beyond the scope of the plan (e.g. woodland on rural leases). The plan (which is only slightly modified from the draft) provides the framework for dealing with operational issues.
b) Rural landholders in NSW: Two submissions were received containing wide ranging material including opposition to Namadgi and national parks in general, and were highly critical of management.	No amendments were made to the plan in relation to these comments.
c) Groups: One submission noted that some groups were not included in the list in s. 10.3.1.	The list has been reviewed and expanded

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Chapter 11: A protected and managed resource	
A relatively small number of submissions referred to this chapter. Comments covered a range of (mostly detailed) matters.	
<i>a) Implementation plan:</i> It was suggested there should be an implementation plan with regular review and updating.	A table containing actions with priorities attached is included as an appendix to the plan.
<i>b) Commercial facilities:</i> One submission expressed opposition to commercialisation in the park.	The plan does not promote commercial activities though it provides for them, provided they are consistent with management objectives (s. 11.4.2; Objective 59). Any commercial activities proposed or undertaken in the park also must comply with other ACT Government policies and guidelines (Objective 59).
<i>c) Fees/licensing:</i> A few submissions commented on entry fees (more opposition than support) in relation to non-commercial and private visitors to the park. There was also comment on licensing for commercial use.	The question of fees is considered to be adequately covered in Policy 58.1. Policies regarding licensing of commercial operators are contained in s. 8.8.1.
<i>d) Other:</i> Other matters raised by submissions included position of Conservator (suggested should be independent of government), water quality (effect of fire trails), noise (generators, aircraft), cultural heritage, environmental impact assessment, military training, fire arms (both 'carrying' and 'use' should be stated), vegetation clearing. It was suggested that planning and management standards should be equal to or better than the highest standards of environmental protection in other jurisdictions of the Australian Alpine Park.	These matters were reviewed and some minor changes made to the plan. Some refer to matters previously dealt with. Prohibition on use of generators in park campgrounds has been added (Policy 52.1). A section (11.2.7) has been added on use of chemicals in the park.

3. Namadgi NP Draft Management Plan - Submissions Received

Total number submissions = 175 consisting of:

- Organisations 49
- Individuals 126

Submissions made by Organisations

Ref.	Organisation	Representative
O-001	ACT Bushfire Council	Jeffery, Kevin & Watson, Dee
O-002	ACT Equestrian Association	Stone, Beth
O-003	ACT Flora & Fauna Committee	Osborne, Dr Will
O-004	ACT Hang Gliding and Paragliding Association	Elston, Mark
O-005	ACT Natural Resource Management Committee	Fraser, Ian
O-006	ACT Rogaining Association (ACTRA)	Murray, Emma
O-007	ACT Rural Landholders Association	Adams, H.J.P.
O-008	ACT Walking for Pleasure Inc	Blackmore, Ray
O-009	ACTEW	Costello, Michael
O-010	ACTPLA	Evans, Gavin
O-011	ACTSPORT	Perry, W Joan
O-012	ANU Mountaineering Club	Battersby, Annabel
O-013	Australian Capital Tourism	MacDiarmid, Ross
O-014	Australian Mountain Running Association (AMRA)	Harding, John
O-015	Australian Native Plants Society Canberra Region Inc (ANPS)	Russell, Andy
O-016	BNT (Bicentennial National Trail - Co-ordinator NSW)	Roberts, Col
O-017	BNT (Bicentennial National Trail - Co-ordinator Yaouk to Hall)	Costin, Jenny
O-018	Buru Ngunnawal Aboriginal Corporation	Bell, Don
O-019	Canberra Alpine Club	Bolt, Tony
O-020	Canberra Bushwalking Club	Davies, Irene
O-021	Canberra Bushwalking Club (Conservation Officer)	Thwaite, John
O-022	Canberra Climbers Association (CCA)	Zaharias, Zac
O-023	Canberra Off-Road Cyclists (CORC)	Guihot, Reece
O-024	Canberra Ornithologists Group	McGuinness Julie; Bounds, Jenny
O-025	Coast and Mountain Walkers of NSW Inc.	Howard, Jeff
O-026	Colong Foundation for the Wilderness Inc	Muir, Keith
O-027	Conservation Council SE Region and Canberra	Harrup, Trish
O-028	Corin Forest (W.G Promotions P/L)	Manager (by Fax)
O-029	CRES	White, Professor Ian et al
O-030	David Hogg P/L	Hogg, David
O-031	Friends of ACT Arboreta	Fearnside, Tony
O-032	Friends of Grasslands	Hope, Geoffrey
O-033	Friends of the Aranda Bushland Inc	Falconer, Mary

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Ref.	Organisation	Representative
O-034	Gudgenby Bush Regeneration Group Inc	Hurlstone, Clive
O-035	Institute of Foresters of Australia ACT Division	Pritchard, Phil
O-036	Kosciusko Huts Association Inc	Sexton, Maurice
O-037	Lanyon Bowl Landcare Group	Geike, Andrew
O-038	Mt Clear Range Neighbours of Namadgi	Spencer, Peter
O-039	National Parks Association - ACT	Goonrey, Christine
O-040	National Parks Association - NSW	Roy, Heather
O-041	National Trust of Australia (ACT)	Dowling, Peter
O-042	NCA (National Capital Authority)	Pegrum, Annabelle
O-043	NSW Dept of Environment & Conservation (NSWNPWS)	Henchman, Alistair
O-044	Orienteering ACT	Jones, Bill
O-045	Outward Bound Australia	Black, Darren
O-046	Phoenix 4WD Club of Victoria	Cribbes, John & Esther
O-047	Sydney Rockclimbing Club Inc	Westren, Kevin
O-048	University of Canberra Outdoors Club	University of Canberra Outdoors Club
O-049	Wednesday Walkers Bushwalking Group	Gavin, Steve; Ferguson, Mal; Giles, Graham; Stauch, Peter; Swift, Ray; Swift, Hugh; Taylor, Brian; Thirkell; Thompson, Mike
O-050	Wilderness Society	McGuinness, Julie

Submissions made by Individuals

Ref. No.	Affiliations/Support	Author
I-001	Conservation	Akhurst, Barbara
I-002	Conservation/Bushwalking	Anderson, Andy
I-003	Orienteer/Rogaine	Anderson, Stuart
I-004	Activities	Aylott, Michael
I-005	Conservation/Birds	Barr, Joe
I-006	Catchment Mg't and/or Fire	Bartlett, Tony
I-007	Orienteer/Rogaine	Bleakley, Neville
I-008	Conservation/Birds	Bounds, Jenny
I-009	Orienteer/Rogaine	Boyland, Peter
I-010	Orienteer/Rogaine	Bradford, Don
I-011	Orienteer/Rogaine	Bridgart, Glenn
I-012	Indigenous issues	Brown, Anthony
I-013	Orienteer/Rogaine	Brown, Sue
I-014	Other - utilities	Bugg, Gavin
I-015	Orienteer/Rogaine	Burrell, Penny
I-016	Orienteer/Rogaine	Butzer, Christine
I-017	Orienteer/Rogaine	Calver, Bronwyn
I-018	Conservation	Chalk, Martin
I-019	Orienteer/Rogaine	Challen, Michael
I-020	Orienteer/Rogaine	Cogley, Toby

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Ref. No.	Affiliations/Support	Author
I-021	Conservation	Comfort, S.
I-022	Orienteer/Rogaine	Conley, Keith
I-023	Orienteer/Rogaine	Cox, Kevin
I-024	Orienteer/Rogaine	Coyne, Peter
I-025	Orienteer/Rogaine	Creaser, Phil
I-026	Orienteer/Rogaine	Cunningham, Sue
I-027	Rec - Cycling	Dessi, Patrick
I-028	Orienteer/Rogaine	Duda, Jason
I-029	Orienteer/Rogaine	Dwyer, James
I-030	Conservation	Edwards, Muriel
I-031	Rec - Snow Play	Edwards, Oliver John
I-032	Rec – Horse riding	Elsbury, James
I-033	Conservation	Engram, Chesley
I-034	Rec – Rock climbing	Evans, Gavin
I-035	Catchment Mg't and/or Fire	Falconer, Ian
I-036	Catchment Mg't and/or Fire	Fearnside, Tony
I-037	Orienteer/Rogaine	Fischer, Paul
I-038	Orienteer/Rogaine	Floro, Paul
I-039	Rural issues	Franklin, N A F
I-040	Orienteer/Rogaine	Fryer, Dr Martin
I-041	Conservation	Geue, Jean
I-042	Conservation	Goodrum, Joan
I-043	Conservation	Goonrey, Christine & Michael
I-044	Orienteer/Rogaine	Gregson, Mark
I-045	Orienteer/Rogaine	Gregson, Wayne
I-046	Conservation	Griffiths, Rod
I-047	Orienteer/Rogaine	Haiblen, Snowy
I-048	Orienteer/Rogaine	Hairsine, Peter
I-049	Orienteer/Rogaine	Harrap, Michael and Margaret
I-050	Conservation	Haskew, Len
I-051	Conservation	Hatch, Henry
I-052	Orienteer/Rogaine	Hatherly, Chris
I-053	Orienteer/Rogaine	Hawkins, Jenny
I-054	Conservation + Rock climbing	Henderson, Adam
I-055	Orienteer/Rogaine	Herron, Natasha
I-056	Conservation	Hope, Professor Geoff & Whinam, Dr Jennie
I-057	Orienteer/Rogaine	Jansen, Leone
I-058	Conservation	Jesiolowski, Barbara
I-059	Orienteer/Rogaine	Johnston, Norman
I-060	Conservation	Kelly, David
I-061	Conservation	Kelly, Judy
I-062	Other	Anonymus
I-063	Rural	Lance AM, Kurt
I-064	Conservation	Lawrence, Max
I-065	Orienteer/Rogaine	Lee, Jason

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Ref. No.	Affiliations/Support	Author
I-066	Conservation	Lenz, Sonja
I-067	Conservation	Lipscombe, Trevor and Joan
I-068	Orienteer/Rogaine	Logie, Heather
I-069	Conservation	MacDonald Brand, Fiona
I-070	Rural	Martin, Richard and Josephine
I-071	Orienteer/Rogaine	McAuley, Helen
I-072	Conservation	McCue, Kevin
I-073	Conservation	McKone, Magaret
I-074	Conservation	McLeod, I.R.
I-075	Orienteer/Rogaine	McManus, Robert
I-076	Orienteer/Rogaine	McMaster, Alina
I-077	Orienteer/Rogaine	Miethke, Pat
I-078	Orienteer/Rogaine	Moore, Hugh
I-079	Conservation	Mosley, Dr Geoff
I-080	Orienteer/Rogaine	Mouatt, Robert
I-081	Orienteer/Rogaine	O'Callaghan, Helen
I-082	Orienteer/Rogaine	Ong, Cheng Soon
I-083	Other	Palmer, Jack
I-084	Rec – Skiing/Mountain Biking	Paterson, Mike
I-085	Heritage	Pearson, Michael
I-086	Conservation	Pfanner, David
I-087	Orienteer/Rogaine	Piironen, Ari
I-088	Orienteer/Rogaine	Poland, David
I-089	Orienteer/Rogaine	Purcell, Philip
I-090	Conservation	Quinn, Dr Julie
I-091	Conservation	Rath, Hazel
I-092	Other	Renshaw, Peter
I-093	Conservation	Ridgeway, Barrie
I-094	Conservation	Robin, Den
I-095	Rural	Rowell, John
I-096	Orienteer/Rogaine	Sawkins, Jim
I-097	Orienteer/Rogaine	Saye, Jane
I-098	Orienteer/Rogaine	Scott, Anthony
I-099	Conservation	Scott, Ross
I-100	Heritage	Scougall, Babette
I-101	Orienteer/Rogaine	Scown, John
I-102	Conservation	Shaw, Deidre
I-103	Orienteer/Rogaine + MBike	Simpson, Ron
I-104	Conservation	Smith, Ian
I-105	Conservation	Snowdon, Ralph
I-106	Orienteer/Rogaine	Sprague, Susan
I-107	Orienteer/Rogaine	Sutton, John
I-108	Conservation	Teather, David
I-109	Conservation	Teather, Elizabeth
I-110	Conservation	Thompson, Dianne

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Ref. No.	Affiliations/Support	Author
I-111	Conservation	Thompson, Gary
I-112	Orienteer/Rogaine	Trewin, Dennis
I-113	Orienteer/Rogaine	Turner, Graham
I-114	Other	Unknown-1
I-115	Other	Unknown-2
I-116	Orienteer/Rogaine	Vanzella, Denis
I-117	Orienteer/Rogaine	Vaughan, Nick
I-118	Conservation	Walcott, Rosalind
I-119	Other - Fees	Walker, Andrew
I-120	Conservation	Walsh, Timothy & Thompson, Janet
I-121	Orienteer/Rogaine	Wilkinson, Leanne & Scott
I-122	Orienteer/Rogaine	Wood, Geoff
I-123	Research	Worthy, Martin
I-124	Orienteer/Rogaine	Munroe, Nicki
I-125	Other - various	Roso, Darren
I-126	Orienteer/Rogaine	Somerville, Benita